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UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

[MODESTO DIVISION]

In re:

NATHAN BENJAMIN DAMIGO,

Debtor.

Chapter Number: 7

**ELIZABETH SINES, SETH
WISPELWEY, SORONYA
HUDSON, APRIL MUÑIZ, MARCUS
MARTIN, NATALIE ROMERO,
DEVIN WILLIS, CHELSEA
ALVARADO, AND THOMAS
BAKER,**

Plaintiffs,

v.

NATHAN BENJAMIN DAMIGO,

Defendant.

Case No. 19-90003-E-7

Adv. Pro. No. 19-09006-E

DC No. RLE-1

**STATEMENT OF UNDISPUTED FACTS IN
SUPPORT OF PLAINTIFFS’ MOTION FOR
SUMMARY JUDGMENT**
Date: June 26, 2025
Time: 10:30 a.m.
Dept.: E
Judge: Hon. Ronald H. Sargis

Pursuant to Local Bankruptcy Rule 7056-1(a), Plaintiffs Elizabeth Sines, Seth Wispelwey, Soronya Hudson (as successor to Marissa Blair), April Muñiz, Marcus Martin, Natalie Romero, Devin Willis, Chelsea Alvarado, and Thomas Baker (collectively, “**Plaintiffs**”)¹ respectfully submit the following Statement of Undisputed Facts in Support of their Motion for Summary Judgment.

UNDISPUTED FACTS

I. DAMIGO’S WILLFUL AND MALICIOUS ACTS

a. Damigo & Identity Evropa

SUF #	Undisputed Fact	Supporting Evidence ²
1.	As of 2017, Damigo was a self-professed racist, white supremacist, and advocate for the establishment of “a white ethnostate.”	Plaintiffs’ Exhibit 7 at Tr. 158:2-9, 159:17-160:14 Plaintiffs’ Exhibit 40 at 5:50 Joint Exhibit 12 at 7
2.	Damigo became a radicalized white nationalist while in prison, where he read the works of former Ku Klux Klan Grand Wizard David Duke.	Plaintiffs’ Exhibit 7 at Tr. 163:11-25
3.	Damigo founded the white supremacist group Identity Evropa following his release from prison to promote the idea of a white ethnostate.	Joint Exhibit 12 at 7 Plaintiffs’ Exhibit 7 at Tr. 166:3-7
4.	Membership in Identity Evropa was limited to “white people of European heritage.”	Joint Exhibit 12 at 7 Plaintiffs’ Exhibit 7 at Tr. 166:8-23
5.	Black and Jewish people were explicitly barred from joining Identity Evropa.	Plaintiffs’ Exhibit 7 at Tr. 166:8-23
6.	Damigo believed Black people were genetically predisposed to crime, Jewish people were anti-white, and that both groups, along with their supporters, were engaged in a genocidal campaign against the white race.	Plaintiffs’ Exhibit 7 at Tr. 164:23-165:24
7.	Damigo served as Identity Evropa’s leader through the summer of 2017 during the planning of and at Unite the Right.	Joint Exhibit 12 at 7 Plaintiffs’ Exhibit 4 at Tr. 35:22-25 Plaintiffs’ Exhibit 7 at Tr. 185:6-8, 211:22-24

¹ Unless otherwise stated all defined terms have the meaning ascribed to them in the Table of Abbreviations in the Memorandum of Points and Authorities in Support of Plaintiffs’ Motion for Summary Judgment.

² “**Joint Exhibits**” are filed concurrently herewith as exhibits to the Declaration of Robert L. Eisenbach III in Support of the Joint Stipulation of Undisputed Facts. Joint Exhibit Volume 1 consists of Joint Exhibits 1-4 and Joint Exhibit Volume 2 consists of Joint Exhibits 5-17. “**Plaintiffs’ Exhibits**” are filed concurrently herewith as exhibits to the Declaration of Robert L. Eisenbach III in Support of Plaintiffs’ Motion for Summary Judgment. Plaintiffs’ Exhibit Volume 1 consists of Plaintiffs’ Exhibits 1-9; Plaintiffs’ Exhibit Volume 2 consists of Plaintiffs’ Exhibits 10-37; and Plaintiffs’ Exhibit Volume 3 consists of Plaintiffs’ Exhibits 38-52.

SUF #	Undisputed Fact	Supporting Evidence ²
8.	In March 2017, posting under the username Fashy Haircut#9734 on the online messaging platform Discord, Damigo claimed that “[t]he lines between politics and violence is blurring. Welcome to 4th generational warfare.”	Plaintiffs’ Exhibit 21 Plaintiffs’ Exhibit 7 at Tr. 160:19-21, 162:19-163:7
9.	Damigo openly admitted that violence might be necessary to secure his vision for the creation of a white ethnostate.	Joint Exhibit 12 at 7 Plaintiffs’ Exhibit 7 at Tr. 158:20-159:16

b. Damigo’s Participation in Events Leading to Unite the Right

SUF #	Undisputed Fact	Supporting Evidence
10.	In April 2017, Damigo was filmed punching a woman in the face during protests near the University of California, Berkeley campus at what would be known as the “Battle of Berkeley.”	Joint Exhibit 12 at 8 Plaintiffs’ Exhibit 4 at Tr. 48:19-49:18 Plaintiffs’ Exhibit 7 at Tr. 167:22-168:1 Plaintiffs’ Exhibit 48 at 00:18-00:20 Plaintiffs’ Exhibit 49 at Tr. 101:3-101:10
11.	Damigo’s co-defendant in the Charlottesville Action, Richard Spencer, referred to Damigo’s actions as an “iconic moment” for the Alt-Right, and they led to a surge of interest in Identity Evropa.	Joint Exhibit 12 at 8 Plaintiffs’ Exhibit 4 at Tr. 49:11-50:1 Plaintiffs’ Exhibit 49 at Tr. 107:23-108:3
12.	Members of Identity Evropa commented that afterward, recruitment was “swamped” and that “Nathan [Damigo] should punch women in the face more often.”	Plaintiffs’ Exhibit 49 at Tr. 108:20-110:02 Plaintiffs’ Exhibit 12
13.	The following month, Damigo joined with other Charlottesville Defendants including Jason Kessler, Richard Spencer, Matthew Heimbach, and members of Identity Evropa, Vanguard America, and the Traditionalist Work Party, among others, in a coordinated rally of hundreds of members of the Alt-Right bearing lit torches, on a march through the city of Charlottesville, ostensibly to protect a statue of Confederate General Robert E. Lee. Damigo admitted the true purpose of the event was to protest what he viewed as “ethnic cleansing” and “attack on Whites.”	Plaintiffs’ Exhibit 7 at Tr. 174:19-176:121 Plaintiffs’ Exhibit 23 Plaintiffs’ Exhibit 33
14.	The May 2017 event, which would come to be known as Charlottesville 1.0, was planned by members of Identity Evropa, including Damigo.	Plaintiffs’ Exhibit 50 at Tr. 111:18-112:2

SUF #	Undisputed Fact	Supporting Evidence
		Plaintiffs' Exhibit 7 at Tr. 174:19-175:5
15.	The idea for a torch march was suggested by Damigo himself based on videos of torch marches across Europe and Damigo admitted he was aware similar marches were conducted by the Ku Klux Klan.	Plaintiffs' Exhibit 7 at Tr. 177:3-14, 180:1-2
16.	Following Charlottesville 1.0, the attendees gathered in celebration. At an afterparty attended by Damigo and Charlottesville Defendants Kline, Heimbach, Spencer, and Kessler, as well as other white nationalists, attendees chanted the Nazi slogan "Sieg Heil."	Plaintiffs' Exhibit 2 at Tr. 38:9-39:5 Plaintiffs' Exhibit 4 at Tr. 64:10-19 Plaintiffs' Exhibit 49 at Tr. 167:11-12, 15-18 Plaintiffs' Exhibit 36
17.	In an article published shortly after Charlottesville 1.0 for the Daily Stormer, a well-known white supremacist website, Kline described "Nazi leader Richard Spencer, White Sharia Prophet Nathan Damigo of Identity Europa, [and] TWP's Matt Heimbach" leading the event of over 200 people "as they carried torches reminiscent of the 3rd Reich," as "a huge win." Kline added: "The Summer has barely started and we have already won multiple battles in 2017. Stay tuned for more events as we move closer to freedom from International Jewry. Hail Lee! Hail our People! Hail Victory!"	Plaintiffs' Exhibit 49 at Tr. 167:19-22, 168:5-169:12 Plaintiffs' Exhibit 33
18.	Shortly after Charlottesville 1.0, Damigo's co-defendant in the Charlottesville Action Kessler started planning a return to Charlottesville on August 11 and 12, 2017, which he referred to as "Charlottesville 2.0," "Unite the Right," and the "Battle of Charlottesville."	Joint Exhibit 12 at 14-16 Plaintiffs' Exhibit 10 at Tr. 49:22-25; 62:18-25 Plaintiffs' Exhibit 45
19.	Kessler also began recruiting members of the Alt-Right, including Damigo, to participate.	Joint Exhibit 12 at 8, 14-17 Plaintiffs' Exhibit 7 at Tr. 181:23-182:5, 184:10-18
20.	From the beginning, discussions about the event promised violence.	Joint Exhibit 12 at 15-16
21.	Evoking the prior incident when Damigo punched a female counter-protestor, on May 21, 2017, Kessler (MadDimension#A8652) posted on Discord: "I think we need to have a Battle of Berkeley situation in Charlottesville. Bring in the Alt-Right, Proud Boys, Stickman, Damigo, Spencer and fight this shit out."	Plaintiffs' Exhibit 13
22.	Kessler stated: "If you watch the footage that made Battle of Berkeley great almost all the action is taking place in the streets. Maybe we need to do a march through the city after the rally[.]"	Plaintiffs' Exhibit 26

SUF #	Undisputed Fact	Supporting Evidence
23.	Kessler stated that Unite the Right “is going to be more like Battle of Berkeley 2.”	Plaintiffs’ Exhibit 24

c. Damigo’s Participation in Planning of Unite the Right

SUF #	Undisputed Fact	Supporting Evidence
24.	Over the following months, Damigo played a significant role in planning the Unite the Right rally with the other Charlottesville Defendants.	Joint Exhibit 12 at 6-8
25.	At Kessler’s invitation, Damigo agreed to attend Unite the Right and to further promote it among the members of Identity Evropa.	Joint Exhibit 12 at 8 Plaintiffs’ Exhibit 4 at Tr. 101:16-18 Plaintiffs’ Exhibit 7 at Tr. 181:23-182:5, 184:10-18
26.	Damigo admitted at trial that he and Identity Evropa were working with other Alt-Right groups to plan Unite the Right.	Joint Exhibit 12 at 6-8
27.	Damigo communicated often with leaders of the Alt-Right and white supremacist groups involved in planning Unite the Right and had frequent calls with at least three other named co-defendants about Unite the Right.	Joint Exhibit 12 at 6-8 Plaintiffs’ Exhibit 49 at Tr. 293:10-293:13, 296:23-298:2
28.	He also attended Alt-Right parties where planning for Unite the Right was discussed.	Joint Exhibit 12 at 6 Plaintiffs’ Exhibit 4 at Tr. 109:7-110:20
29.	Damigo had previously asked for fake Antifa accounts to be established to create “a small, fake antifa army,” like those that would be used in an effort to bait counter-protestors to attend Unite the Right.	Joint Exhibit 12 at 6-7, 17-18, fn.10 Plaintiffs’ Exhibit 7 at Tr. 201:3-202:8 Plaintiffs’ Exhibit 19 Plaintiffs’ Exhibit 20
30.	Damigo testified at trial that “[a] lot of members” of Identity Evropa were involved in organizing Unite the Right.	Joint Exhibit 12 at 8 Plaintiffs’ Exhibit 7 at Tr. 195:12-16
31.	Damigo delegated much of the planning responsibility on behalf of Identity Evropa to Charlottesville Defendant and Identity Evropa member Elliott Kline (who at the time went by the alias “Eli Mosley” after British fascist Oswald Mosley).	Plaintiffs’ Exhibit 7 at Tr. 185:15-187:2, 190:12-13; 245:13-16 Plaintiffs’ Exhibit 49 at Tr. 31:23-32:7, 328:10-329:21
32.	Together Damigo and Kline encouraged members of Identity Evropa to attend Unite the Right.	Plaintiffs’ Exhibit 49 at Tr. 277:11-19
33.	Throughout the spring and summer of 2017, Damigo and Kline communicated about Unite the Right via text, phone, and Slack messages.	Plaintiffs’ Exhibit 49 at Tr. 215:4-16
34.	Damigo delegated authority to Kline to “approve activism” for Identity Evropa and for its members.	Plaintiffs’ Exhibit 7 at Tr. 185:15-21

SUF #	Undisputed Fact	Supporting Evidence
35.	Damigo instructed Kessler to communicate directly with Kline and Kline in turn kept Damigo filled in on the planning for Unite the Right.	Plaintiffs' Exhibit 7 at Tr. 184:11-25, 190:12-13
36.	Damigo described Kline as "very, very involved with Kessler on" organizing Unite the Right.	Plaintiffs' Exhibit 7 at Tr. 186:4-9
37.	Kline described planning Unite the Right as "his full-time job."	Plaintiffs' Exhibit 49 at Tr. 199:9-200:2, 200:6-200:8
38.	Damigo provided Kline with a salary from Identity Evropa in the summer of 2017.	Plaintiffs' Exhibit 7 at Tr. 188:15-189:12 Plaintiffs' Exhibit 49] at Tr. 278:4-7
39.	Damigo was the owner and creator of the Identity Evropa server on the online messaging platform site Discord, which Identity Evropa members, including Damigo, used to plan Charlottesville 2.0.	Joint Exhibit 12 at 8 Plaintiffs' Exhibit 7 at Tr. 167:15-21
40.	Damigo and his co-conspirators primarily used Discord to communicate about and plan for Unite the Right.	Plaintiffs' Exhibit 7 at Tr. 167:2-21 Plaintiffs' Exhibit 10 at Tr. 61:3-5, 69:9-70:1 Plaintiffs' Exhibit 49 at Tr. 176:16-19, 270:25-271:7 Joint Exhibit 12 at 15
41.	Leading up to Unite the Right, violence—particularly the idea of using cars to run over counter-protestors—was a "constant theme" on the Discord and elsewhere.	Joint Exhibit 12 at 57
42.	Posts on a Discord channel used to plan Unite the Right included an image of buses driving through crowds of people with the comment "[t]his will be us" and a picture of a tractor captioned "multi-lane protestor digester."	Plaintiffs' Exhibit 25
43.	Charlottesville Defendant Cantwell posted on the messaging platform Telegram: "Blocking traffic is not a peaceful protest, and every person who reminds you of that without using his car, is giving you more slack than you fucking deserve."	Plaintiffs' Exhibit 37 Plaintiffs' Exhibit 10 at Tr. 207:2-23
44.	Kline posted to Discord in July 2017: "I think we are gonna see some serious brawls at cville next month too and we'll see blood on some of these white polos lol."	Plaintiffs' Exhibit 14
45.	Kline told Spencer: "This is going to be a violent summer."	Plaintiffs' Exhibit 42
46.	Kline organized a group, primarily composed of Identity Evropa members, to serve as a security detail for Spencer during Unite the Right and Kline and this group drafted orders on security and the use of defensive weapons like shields.	Plaintiffs' Exhibit 49 at Tr. 288:17-289:20, 290:02-290:12
47.	Kline also discussed attendees bringing guns because at least one member of Identity Evropa was "convinced this will turn into a shoot-out,"	Plaintiffs' Exhibit 49 at Tr. 334:21-336:9, 339:24-340:19

SUF #	Undisputed Fact	Supporting Evidence
	although the same member also commented that “[i]mpaling people is always the best option[.]”	Plaintiffs’ Exhibit 15 Plaintiffs’ Exhibit 47
48.	Damigo personally approved battle gear for Identity Evropa members to wear at Unite the Right, including shields and helmets, and granted specific members of Identity Evropa permission to attend Unite the Right.	Joint Exhibit 12 at 8 Plaintiffs’ Exhibit 7 at Tr. 196:7-22
49.	On August 10, 2017, Damigo posted to the Identity Evropa Discord server announcement channel: “@everyone We will be going to Charlott[e]sville with or without a permit. The city council can go shove their permit up their ass.”	Plaintiffs’ Exhibit 18 Plaintiffs’ Exhibit 49 at Tr. 398:20-399:15
50.	Damigo and Kline’s planning efforts were successful and “[a] ‘detachment of fighters’ from Identity Evropa showed up at Unite the Right[.]”	Joint Exhibit 12 at 13 <i>See also</i> Plaintiffs’ Exhibit 6 at Tr. 154:15–155:17; Plaintiffs’ Exhibit 7 at Tr. 196:7–11
51.	Members of Identity Evropa stayed together an Airbnb in Charlottesville, which was also used as a meeting location by Damigo, Kline, Kessler, and Spencer.	Plaintiffs’ Exhibit 49 at Tr. 376:20-377:24

d. August 11 Torch March

SUF #	Undisputed Fact	Supporting Evidence
52.	On Friday, August 11, 2017, Damigo’s co-defendants, including Kline and other members of Identity Evropa, “led hundreds wielding lit tiki torches and chanting[,] ‘You will not replace us,’ ‘Jews will not replace us,’ ‘Blood and soil,’ and ‘Sieg Heil,’ through University of Virginia grounds up to the Rotunda and down to the Thomas Jefferson statue,” where the marchers surrounded counter-protestors (including Plaintiffs Willis and Romero), preventing them from escaping, pepper-spraying them, and subjecting them to racist insults.	Joint Exhibit 12 at 15 Joint Exhibit 15 at 8 Plaintiffs’ Exhibit 1 at Tr. 23:4-11, 25:17-23, 26:5-27:9, 29:1-16, 172:2-23, 177:5-11, 180:10-181:19 Plaintiffs’ Exhibit 3 at Tr. 117:2-118:5 Plaintiffs’ Exhibit 4 at Tr. 155:7-14, 156: 3-12 Plaintiffs’ Exhibit 10 at Tr. 129:7-10 Plaintiffs’ Exhibit 49 at Tr. 383:20-384:08, 384:17-21 Plaintiffs’ Exhibit 38 Plaintiffs’ Exhibit 39
53.	The torch march was evocative of the Third Reich and mirrored the Charlottesville 1.0 torch march, which had been Damigo’s idea and in which Damigo, Kline, members of Identity Evropa, and	Plaintiffs’ Exhibit 7 at Tr. 174:19-175:9, 176:15-21, 177:3-14, 180:1-2

SUF #	Undisputed Fact	Supporting Evidence
	several of Damigo's co-defendants had participated.	Plaintiffs' Exhibit 3 at Tr. 160:23-161:12 Plaintiffs' Exhibit 49 at Tr. 167:19-22, 168:5-169:12 Plaintiffs' Exhibit 33
54.	Kline, working on behalf of Identity Evropa, coordinated the timing of the torch march on August 11, 2017, and directed the Alt-Right protestors on the ground toward the Thomas Jefferson statue.	Plaintiffs' Exhibit 49 at Tr. 290:13-20, 381:18-382:14 Plaintiffs' Exhibit 4 at Tr. 205:15-17
55.	Individuals wearing Identity Evropa polo shirts could be seen marching with tiki torches.	Plaintiffs' Exhibit 35
56.	Intentionally Omitted	

e. August 12 Rally and Car Attack

SUF #	Undisputed Fact	Supporting Evidence
57.	The next day, Saturday, August 12, 2017, hundreds of Alt-Right protestors marched through the streets of Charlottesville toward the statue of General Robert E. Lee in Emancipation Park.	Plaintiffs' Exhibit 1 at Tr. 35:7-18 Plaintiffs' Exhibit 7 at Tr. 54:21-55:3 Plaintiffs' Exhibit 10 at Tr. 136:12-20
58.	As planned by the Charlottesville Defendants, many of the protestors were clad in uniforms and helmets, and carried shields and makeshift weapons.	Plaintiffs' Exhibit 1 at Tr. 36:12-37:6, 199:20-200:18 Plaintiffs' Exhibit 34
59.	The event—as anticipated—quickly turned violent with the Alt-Right protestors, led by several of Damigo's co-defendants charging into crowds of peaceful counter-protestors.	Joint Exhibit 12 at 74
60.	Columns of groups led by the Charlottesville Defendants "march[ed] in battle formation, charged into a line of stationary counter-protestors and used flagpoles and shields as weapons and pepper spray in the melee that followed."	Joint Exhibit 12 at 74
61.	Kline, working on behalf of Identity Evropa, was a leader and frontline commander on the ground on August 12, 2017.	Plaintiffs' Exhibit 49 at Tr. 424:16-25 Plaintiffs' Exhibit 4 at Tr. 205:15-17
62.	Kline marched at the head of a column of Alt-Right protestors who were wearing helmets and gloves, carrying flags and shields, and chanting, "Blood and soil."	Plaintiffs' Exhibit 32
63.	Numerous assaults by Alt-Right protestors also took place in a nearby garage, including the violent beating of a Black man by a member of Charlottesville Defendant League of the South	Joint Exhibit 12 at 56, n.19 Plaintiffs' Exhibit 31

SUF #	Undisputed Fact	Supporting Evidence
	and other Alt-Right protestors.	
64.	Damigo himself attended the rally on August 12, 2017, where he communicated and met up with Kline.	Plaintiffs' Exhibit 49 at Tr. 215:25-216:6, 423:19-21
65.	Damigo was slated to give the closing speech of the day, following others including his co-defendants Spencer, Kessler, Hill, Heimbach, and Cantwell.	Plaintiffs' Exhibit 27 at 72-73
66.	Damigo and Identity Evropa paid for vans to transport the Alt-Right leaders directly to Emancipation Park to avoid the "scuffles" in the streets.	Plaintiffs' Exhibit 7 at Tr. 224:8-16, 224:25-225:7
67.	After the police declared a state of emergency and ordered the protestors to leave Emancipation Park, Damigo defied police orders, remained in the park with other of the Charlottesville Defendants, and was arrested.	Plaintiffs' Exhibit 7 at Tr. 202:12-15, 203:13-14
68.	At the rally, Damigo's co-defendant James Alex Fields Jr. was photographed with Kline and members of Charlottesville Defendant Vanguard America.	Plaintiffs' Exhibit 49 at Tr. 428:22-429:13 Plaintiffs' Exhibit 41
69.	Fields had previously tweeted to Damigo: "Defending the innocent is a good idea, defending private property is a good idea, both require Force."	Plaintiffs' Exhibit 46
70.	Fields had previously re-tweeted the video of Damigo punching a female protestor at the Battle of Berkeley.	Plaintiffs' Exhibit 51
71.	After the police declared a state of emergency, Fields got into his Dodge Challenger and drove it through a crowd of counter-protestors, killing one woman and injuring several others, including five of the Charlottesville Plaintiffs.	Joint Exhibit 12 at 20, 36-37, 47, 73-74 Plaintiffs' Exhibit 44 Plaintiffs' Exhibit 11 Plaintiffs' Exhibit 28

f. Celebration and Aftermath

SUF #	Undisputed Fact	Supporting Evidence
72.	Damigo celebrated the atrocities committed on August 11 and 12, 2017, calling Unite the Right a huge success.	Plaintiffs' Exhibit 7 at Tr. 203:15-23
73.	Damigo attended a celebratory after party on the evening of August 12, 2017, along with other rally attendees.	Plaintiffs' Exhibit 7 at Tr. 203:15-20
74.	Damigo also praised Kline for "doing an excellent job and deserving the highest praise from the entire organization" and then turned leadership of Identity Evropa over to Kline because Damigo "trusted him to lead the organization."	Plaintiffs' Exhibit 7 at Tr. 210:3-211:12
75.	After the events of August 11 and 12, 2017, Identity Evropa members went on the Discord server to congratulate others on "what they saw []	Joint Exhibit 12 at 8 Plaintiffs' Exhibit 22

SUF #	Undisputed Fact	Supporting Evidence
	akin to a battlefield victory” stating, among other things, that the rally was “a huge victory” and praising the “excellent work.”	Plaintiffs’ Exhibit 16
76.	Specifically, the members credited Damigo, in part, with the Rally’s success cheering “[h]ail Nathan [Damigo]” and “[t]hanks for everything you did for our people this weekend @Fashy Haircut [Damigo].” To which Damigo replied: “No problem, man. Fuck the police.”	Plaintiffs’ Exhibit 17 Joint Exhibit 12 at 13 Plaintiffs’ Exhibit 7 at Tr. 207:10-12
77.	Mere days after Unite the Right, Damigo exchanged messages with another member of Identity Evropa in which Damigo ordered the Discord server shut down and directed Identity Evropa members not to speak to the police.	Joint Exhibit 12 at 9 Plaintiffs’ Exhibit 7 at Tr. 209:2-18 Plaintiffs’ Exhibit 29 Plaintiffs’ Exhibit 30
78.	The Virginia District Court identified in the Post-Trial Opinion that the jury had before it “evidence that Damigo sought to conceal Identity Evropa’s role in the planning of and participation in Unite the Right” and described it as “the type of behind-the-scenes evidence which often isn’t uncovered in a conspiracy.”	Joint Exhibit 12 at 9

g. Plaintiffs’ Injuries

SUF #	Undisputed Fact	Supporting Evidence
79.	The events of the weekend ultimately injured each of the Plaintiffs, including severe and debilitating physical and psychological injuries.	Joint Exhibit 12 at 73-74
80.	Plaintiffs Willis and Romero suffered severe psychological and emotional stress from the events of August 11, 2017, where they were surrounded by the mob of Alt-Right protesters led by Damigo’s co-defendants Kessler, Spencer, Kline, and others at the torch march, spat upon, cursed at, and called racially discriminatory names.	Joint Exhibit 12 at 74
81.	Plaintiffs Martin, Blair, Baker, Romero, and Alvarado were each injured by Fields’s car attack.	Joint Exhibit 12 at 73 Plaintiffs’ Exhibit 9 at Tr. 12:11-23 Plaintiffs’ Exhibit 5 at Tr. 208:11-209:7, 213:9-214:6 Plaintiffs’ Exhibit 1 at Tr. 49:20-51:7 Plaintiffs’ Exhibit 6 at Tr. 17:23-18:6
82.	Martin’s left leg was shattered, his ankle fractured, he had ligament damage in his foot, scrapes on his right leg, and he was diagnosed with a brain injury and PTSD.	Joint Exhibit 12 at 73 Plaintiffs’ Exhibit 9 at Tr. 19:11-19, 24:15-25

SUF #	Undisputed Fact	Supporting Evidence
83.	Martin pushed his then-fiancée Blair out of the path of Fields's car. Blair suffered a hematoma on her leg, scrapes and cuts, and injured ribs.	Joint Exhibit 12 at 73
84.	Baker suffered a concussion, lacerations and bruising all over his body, a torn ligament in his left wrist, and a right hip labral tear.	Joint Exhibit 12 at 73 Plaintiffs' Exhibit 5 at Tr. 216:18-12
85.	Romero suffered a fractured skull, severe concussion, a shattered tooth root, lip laceration and cuts and bruises to her legs.	Joint Exhibit 12 at 73 Plaintiffs' Exhibit 1 at Tr. 57:23-58:2
86.	Alvarado suffered a concussion, contusions on her upper thighs, a hematoma on her left knee, and cuts and scrapes to her arms and hands.	Joint Exhibit 12 at 73 Plaintiffs' Exhibit 6 at Tr. 23:12-17, 24:14-22
87.	Sines narrowly escaped the path of Fields's car, but subsequently developed PTSD and major depressive disorder.	Joint Exhibit 12 at 73-74 Plaintiffs' Exhibit 9 at Tr. 75:19-21
88.	Muñiz also watched in terror as Fields's car drove into the crowd of people.	Plaintiffs' Exhibit 8 at Tr. 221:20-222:11
89.	As a result of Muñiz' experience, she developed Acute Stress Disorder and PTSD.	Plaintiffs' Exhibit 8 at Tr. 226:4-13
90.	Wispelwey, a United Church of Christ minister who ministered to the community on August 11, 2017 and attended August 12, 2017 with other faith leaders to peacefully counter-protest, suffered PTSD, severe anxiety, panic attacks, and night terrors from the events he witnessed.	Plaintiffs' Exhibit 7 at Tr. 34:11-24, 65:2-67:5 Plaintiffs' Exhibit 43

Respectfully submitted,

Dated: May 8, 2025

COOLEY LLP

By: /s/ Robert L. Eisenbach III

Robert L. Eisenbach III

Attorney for Plaintiffs